

Exhibit 43

Robert Klugman – January 28, 2021

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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 CASE NO. 18-MD-2865 (LAK)

4 IN RE:)
5)
6 CUSTOMS AND TAX ADMINISTRATION OF)
7 THE KINGDOM OF DENMARK)
8 (SKATTEFORVALTNINGEN) TAX REFUND)
9 SCHEME LITIGATION)
10))
11 This document relates to case nos.)
12 19-cv-01783; 19-cv-01788; 19-cv-01794;)
13 19-cv-01798; 19-cv-01918)
14))

15 REMOTE VTC VIDEOTAPED DEPOSITION UNDER ORAL
16 EXAMINATION OF
17 ROBERT KLUGMAN

18 DATE: January 28, 2021

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25 REPORTED BY: MICHAEL FRIEDMAN, CCR

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1 R O B E R T K L U G M A N ,
2 called as a witness, having been first
3 duly sworn according to law, testifies as follows:
4
5

6 EXAMINATION BY MR. MAGUIRE:

7 Q Good morning, Mr. Klugman?

8 A Good morning.

9 Q So I'm Bill Maguire and I represent
10 the plaintiff who I'm going to call SKAT.
11 And I will ask you questions today.

12 We need a clear record, so could I
13 ask you, please, if there's any question that
14 I ask you that you don't understand, please
15 let me know and give me a chance to fix the
16 question.

17 A Okay. Just one question before we
18 start. Your audio is a little -- I don't
19 know if I'm the only person to hear the
20 audio.

21 It's a little fuzzy compared to the
22 other two previous speakers.

23 Q I will move a little closer.

24 Is that a little better?

25 A A little better, yes.

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1 going forward.

2 Q So that was just after -- same
3 month, but later in the month, as the first
4 trades that were done in early August.

5 Was there any discussion about
6 those trades?

7 A Not that I recall. It's certainly
8 possible that that would have been covered.

9 Q And what do you recall about that,
10 the discussion of trades going forward?

11 A I don't remember specifically. It
12 was just, I think, we -- we may have
13 confirmed that the profit split. But other
14 than that, I don't really recall anything
15 specifically.

16 Q And what was the profit split?

17 A That he was going to get 75 percent
18 of the reclaims.

19 Q And then the remaining 25 percent
20 would be split among the other participants?

21 A Yes.

22 Q Was there any discussion of the
23 expectation of the return, what the hundred
24 percent, what that would be?

25 A I don't recall that overall level